

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

<i>MICHELLE M. REDD,</i>)	
Plaintiff,)	
)	
v.)	
)	
)	
<i>HEALTHCARE REVENUE RECOVERY GROUP, L.L.C.,</i>)	
<i>D/B/A ARS ACCOUNT RESOLUTION SERVICES,</i>)	
Defendant.)	

**PLAINTIFF MICHELLE REDD’S MOTION TO FILE *INSTANTER* HER RESPONSE
TO THE DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Plaintiff Ms. Redd, by her counsel, Paúl Camarena, respectfully moves the Court for leave to file *instanter* her Response to the Defendant’s Motion for Summary Judgment. The Court ordered Ms. Redd to file her Response by January 17, 2022, Martin Luther King Day. Ms. Redd filed her response on January 18 at 1:30am, which was within one hour and a half of the due date. Counsel submits that his delay is too brief to prejudice the Defendant. Thus, the Court should grant Plaintiff leave to file her response *instanter*.

Respectfully submitted
Plaintiff Michelle Redd’s Counsel
North & Sedgewick LLC
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